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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

THE LYLE BERMAN FAMILY PARTNERSHIP; NEIL I SELL, in his capacity as Trustee for the Julie Berman Irrevocable Trust U/TA 8/9/89, the Bradley Berman Irrevocable Trust U/TA 8/9/89, the Jessie No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05071 (SMB)

Lynn Berman Irrevocable Trust U/TA 8/9/89 and the Amy Berman Irrevocable Trust U/TA 8/9/89; STANLEY TAUBE, in his capacity as Trustee for the Julie Berman Irrevocable Trust U/TA 8/9/89, the Bradley Berman Irrevocable Trust U/TA 8/9/89, the Jessie Lynn Berman Irrevocable Trust U/TA 8/9/89, and the Amy Berman Irrevocable Trust U/TA 8/9/89; JULIE BERMAN IRREVOCABLE TRUST U/TA 8/9/89, in its capacity as a Partner of The Lyle Berman Family Partnership; BRADLEY BERMAN IRREVOCABLE TRUST U/TA 8/9/89, in its capacity as a Partner of The Lyle Berman Family Partnership; JESSIE LYNN BERMAN IRREVOCABLE TRUST U/TA 8/9/89, in its capacity as a Partner of The Lyle Berman Family Partnership; AMY BERMAN IRREVOCABLE TRUST U/TA 8/9/89, in its capacity as a Partner of The Lyle Berman Family Partnership; JULIE BERMAN; BRADLEY BERMAN; JESSIE LYNN BERMAN; and AMY BERMAN,

Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures were due: April 30, 2014
- 2. Fact Discovery shall be completed by: May 18, 2015
- 3. The Disclosure of Case-in-Chief Experts shall be due: August 19, 2015
- 4. The Disclosure of Rebuttal Experts shall be due: September 18, 2015
- 5. The Deadline for Completion of Expert Discovery shall be: December 17, 2015
- 6. The Deadline for Mediation Referral shall be: February 16, 2016

- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: March 1, 2016
- 8. The Deadline for Conclusion of Mediation shall be: June 28, 2016

New York, New York December 17, 2014

Of Counsel:

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By: /s/ Nicholas Cremona

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